

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**MOTION FOR LEAVE TO WITHDRAW
AS CO-COUNSEL OF RECORD FOR ALL PLAINTIFFS**

Pursuant to Local Civil Rule 1.4, the undersigned, David I. Schoen, co-counsel for all Plaintiffs in this case respectfully seeks leave of the Court to withdraw from this case.

The undersigned first appeared in this case as co-counsel for all Plaintiffs on August 7, 2012. [DE 250] Accordingly, the undersigned has only been involved in the case for approximately five months of the nine years since the case first was filed. Allowing the undersigned to withdraw would simply return the case to its status quo ante, with all Plaintiffs still represented by able and experienced counsel.

The procedural posture of the case is that fact discovery will be closing within a time frame to be set by the Court, based on a full consideration of issues addressed in a recent submission directed by the Magistrate Judge. [See DE 295-297] Following that decision and the conclusion of fact discovery, according to the Scheduling Order, [DE 131], there will be an expert discovery period of approximately four months, with a briefing on any summary judgment motion and pre-trial order submissions deferred to a date to be announced at a conference following the completion of the above. [DE 131 at Para. 12]. Naturally, the case is not yet on any trial calendar.

The undersigned is not asserting a retaining or charging lien in the case. The undersigned has not sought nor been paid any attorney's fee for the undersigned's work in the case to date.

Finally, the undersigned respectfully requests that this submission be deemed satisfactory to permit the undersigned's withdrawal as counsel for the Plaintiffs in this case without requiring any showing of reasons for the withdrawal, given the short period of time the undersigned has been involved in the case and the fact that Plaintiffs' representation will return to the status quo ante, with Plaintiffs represented by able and experienced counsel.

Date: January 16, 2013

Respectfully Submitted,

/s/ David I. Schoen
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